

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Statement of Issues Against:

**JACQUELEEN ANN WILLIAMS**

Registered Nurse License Applicant

Respondent

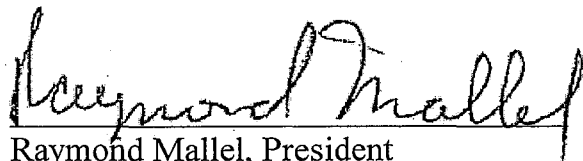
Case No. 2013-87

**DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in the above entitled matter.

This Decision shall become effective on **April 26, 2013**.

IT IS SO ORDERED **March 28, 2013**.



Raymond Mallel, President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 KAMALA D. HARRIS  
Attorney General of California  
2 MARC D. GREENBAUM  
Supervising Deputy Attorney General  
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7  
8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Statement of Issues  
11 Against:

12 **JACQUELEEN ANN WILLIAMS**

13 **Applicant for Registered Nurse License**

14 Respondent.

Case No. 2013-87

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

15  
16 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
17 entitled proceedings that the following matters are true:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") is the Executive Officer of the Board  
20 of Registered Nursing. She brought this action solely in her official capacity and is represented in  
21 this matter by Kamala D. Harris, Attorney General of the State of California, by Zachary T.  
22 Fanselow, Deputy Attorney General.

23 2. Respondent Jacqueline Ann Williams ("Respondent") is representing herself in this  
24 proceeding and has chosen not to exercise her right to be represented by counsel.

25 3. On or about August 11, 2011, Respondent filed an application dated August 8, 2011,  
26 with the Board of Registered Nursing to obtain a Registered Nurse License.

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1 Registered Nursing may communicate directly with the Board regarding this stipulation and  
2 settlement, without notice to or participation by Respondent. By signing the stipulation,  
3 Respondent understands and agrees that she may not withdraw her agreement or seek to rescind  
4 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt  
5 this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall  
6 be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action  
7 between the parties, and the Board shall not be disqualified from further action by having  
8 considered this matter.

9 12. The parties understand and agree that facsimile copies of this Stipulated Settlement  
10 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and  
11 effect as the originals.

12 13. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an  
13 integrated writing representing the complete, final, and exclusive embodiment of their agreement.  
14 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,  
15 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary  
16 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a  
17 writing executed by an authorized representative of each of the parties.

18 14. In consideration of the foregoing admissions and stipulations, the parties agree that  
19 the Board may, without further notice or formal proceeding, issue and enter the following  
20 Disciplinary Order:

21 **DISCIPLINARY ORDER**

22  
23 IT IS HEREBY ORDERED that the application of Respondent Jacqueline Ann Williams  
24 for licensure is hereby granted and a license shall be issued to Respondent upon successful  
25 completion of all licensing requirements. Said license shall immediately be revoked, the order of  
26 revocation stayed and Respondent placed on probation for a period of three (3) years on the  
27 following conditions:

28 **Severability Clause.** Each condition of probation contained herein is a separate and

1 distinct condition. If any condition of this Order, or any application thereof, is declared  
2 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other  
3 applications thereof, shall not be affected. Each condition of this Order shall separately be valid  
4 and enforceable to the fullest extent permitted by law.

5 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A full and  
6 detailed account of any and all violations of law shall be reported by Respondent to the Board in  
7 writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with  
8 this condition, Respondent shall submit completed fingerprint forms and fingerprint fees within  
9 45 days of the effective date of the decision, unless previously submitted as part of the licensure  
10 application process.

11 **Criminal Court Orders:** If Respondent is under criminal court orders, including  
12 probation or parole, and the order is violated, this shall be deemed a violation of these probation  
13 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

14 2. **Comply with the Board's Probation Program.** Respondent shall fully comply with  
15 the conditions of the Probation Program established by the Board and cooperate with  
16 representatives of the Board in its monitoring and investigation of the Respondent's compliance  
17 with the Board's Probation Program. Respondent shall inform the Board in writing within no  
18 more than 15 days of any address change and shall at all times maintain an active, current license  
19 status with the Board, including during any period of suspension.

20 Upon successful completion of probation, Respondent's license shall be fully restored.

21 3. **Report in Person.** Respondent, during the period of probation, shall appear in  
22 person at interviews/meetings as directed by the Board or its designated representatives.

23 4. **Residency, Practice, or Licensure Outside of State.** Periods of residency or  
24 practice as a registered nurse outside of California shall not apply toward a reduction of this  
25 probation time period. Respondent's probation is tolled, if and when she resides outside of  
26 California. Respondent must provide written notice to the Board within 15 days of any change of  
27 residency or practice outside the state, and within 30 days prior to re-establishing residency or  
28 returning to practice in this state.

Respondent shall provide a list of all states and territories where she has ever been licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide information regarding the status of each license and any changes in such license status during the term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing license during the term of probation.

5. **Submit Written Reports.** Respondent, during the period of probation, shall submit or cause to be submitted such written reports/declarations and verification of actions under penalty of perjury, as required by the Board. These reports/declarations shall contain statements relative to Respondent's compliance with all the conditions of the Board's Probation Program. Respondent shall immediately execute all release of information forms as may be required by the Board or its representatives.

Respondent shall provide a copy of this Decision to the nursing regulatory agency in every state and territory in which she has a registered nurse license.

6. **Function as a Registered Nurse.** Respondent, during the period of probation, shall engage in the practice of registered nursing in California for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

For purposes of compliance with this section, "engage in the practice of registered nursing" may include, when approved by the Board, volunteer work as a registered nurse, or work in any non-direct patient care position that requires licensure as a registered nurse.

The Board may require that advanced practice nurses engage in advanced practice nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

If Respondent has not complied with this condition during the probationary term, and Respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of Respondent's probation period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation shall apply.

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1           **7. Employment Approval and Reporting Requirements.** Respondent shall obtain  
2 prior approval from the Board before commencing or continuing any employment, paid or  
3 voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all  
4 performance evaluations and other employment related reports as a registered nurse upon request  
5 of the Board.

6           Respondent shall provide a copy of this Decision to her employer and immediate  
7 supervisors prior to commencement of any nursing or other health care related employment.

8           In addition to the above, Respondent shall notify the Board in writing within seventy-two  
9 (72) hours after she obtains any nursing or other health care related employment. Respondent  
10 shall notify the Board in writing within seventy-two (72) hours after she is terminated or  
11 separated, regardless of cause, from any nursing, or other health care related employment with a  
12 full explanation of the circumstances surrounding the termination or separation.

13           **8. Supervision.** Respondent shall obtain prior approval from the Board regarding  
14 Respondent's level of supervision and/or collaboration before commencing or continuing any  
15 employment as a registered nurse, or education and training that includes patient care.

16           Respondent shall practice only under the direct supervision of a registered nurse in good  
17 standing (no current discipline) with the Board of Registered Nursing, unless alternative methods  
18 of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are  
19 approved.

20           Respondent's level of supervision and/or collaboration may include, but is not limited to the  
21 following:

22           (a) Maximum - The individual providing supervision and/or collaboration is present in  
23 the patient care area or in any other work setting at all times.

24           (b) Moderate - The individual providing supervision and/or collaboration is in the patient  
25 care unit or in any other work setting at least half the hours Respondent works.

26           (c) Minimum - The individual providing supervision and/or collaboration has person-to-  
27 person communication with Respondent at least twice during each shift worked.

28           (d) Home Health Care - If Respondent is approved to work in the home health care

1 setting, the individual providing supervision and/or collaboration shall have person-to-person  
2 communication with Respondent as required by the Board each work day. Respondent shall  
3 maintain telephone or other telecommunication contact with the individual providing supervision  
4 and/or collaboration as required by the Board during each work day. The individual providing  
5 supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to  
6 patients' homes visited by Respondent with or without Respondent present.

7       **9. Employment Limitations.** Respondent shall not work for a nurse's registry, in any  
8 private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse,  
9 or for an in-house nursing pool.

10       Respondent shall not work for a licensed home health agency as a visiting nurse unless the  
11 registered nursing supervision and other protections for home visits have been approved by the  
12 Board. Respondent shall not work in any other registered nursing occupation where home visits  
13 are required.

14       Respondent shall not work in any health care setting as a supervisor of registered nurses.  
15 The Board may additionally restrict Respondent from supervising licensed vocational nurses  
16 and/or unlicensed assistive personnel on a case-by-case basis.

17       Respondent shall not work as a faculty member in an approved school of nursing or as an  
18 instructor in a Board approved continuing education program.

19       Respondent shall work only on a regularly assigned, identified and predetermined  
20 worksite(s) and shall not work in a float capacity.

21       If Respondent is working or intends to work in excess of 40 hours per week, the Board may  
22 request documentation to determine whether there should be restrictions on the hours of work.

23       **10. Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll and  
24 successfully complete a course(s) relevant to the practice of registered nursing no later than six  
25 months prior to the end of her probationary term.

26       Respondent shall obtain prior approval from the Board before enrolling in the course(s).  
27 Respondent shall submit to the Board the original transcripts or certificates of completion for the  
28 above required course(s). The Board shall return the original documents to Respondent after



1 photocopying them for its records.

2       **11. Violation of Probation.** If Respondent violates the conditions of her probation, the  
3 Board after giving Respondent notice and an opportunity to be heard, may set aside the stay order  
4 and impose the stayed discipline (revocation/suspension) of Respondent's license.

5       If during the period of probation, an accusation or petition to revoke probation has been  
6 filed against Respondent's license or the Attorney General's Office has been requested to prepare  
7 an accusation or petition to revoke probation against Respondent's license, the probationary  
8 period shall automatically be extended and shall not expire until the accusation or petition has  
9 been acted upon by the Board.

10       **12. License Surrender.** During Respondent's term of probation, if she ceases practicing  
11 due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation,  
12 Respondent may surrender her license to the Board. The Board reserves the right to evaluate  
13 Respondent's request and to exercise its discretion whether to grant the request, or to take any  
14 other action deemed appropriate and reasonable under the circumstances, without further hearing.  
15 Upon formal acceptance of the tendered license and wall certificate, Respondent will no longer be  
16 subject to the conditions of probation.

17       Surrender of Respondent's license shall be considered a disciplinary action and shall  
18 become a part of Respondent's license history with the Board. A registered nurse whose license  
19 has been surrendered may petition the Board for reinstatement no sooner than the following  
20 minimum periods from the effective date of the disciplinary decision:

21       (1) Two years for reinstatement of a license that was surrendered for any reason other  
22 than a mental or physical illness; or

23       (2) One year for a license surrendered for a mental or physical illness.

24       **13. Physical Examination.** Within 45 days of the effective date of this Decision,  
25 Respondent, at her expense, shall have a licensed physician, nurse practitioner, or physician  
26 assistant, who is approved by the Board before the assessment is performed, submit an  
27 assessment of the Respondent's physical condition and capability to perform the duties of a  
28 registered nurse. Such an assessment shall be submitted in a format acceptable to the Board. If

1 medically determined, a recommended treatment program will be instituted and followed by the  
2 Respondent with the physician, nurse practitioner, or physician assistant providing written reports  
3 to the Board on forms provided by the Board.

4 If Respondent is determined to be unable to practice safely as a registered nurse, the  
5 licensed physician, nurse practitioner, or physician assistant making this determination shall  
6 immediately notify the Board and Respondent by telephone, and the Board shall request that the  
7 Attorney General's office prepare an accusation or petition to revoke probation. Respondent shall  
8 immediately cease practice and shall not resume practice until notified by the Board. During this  
9 period of suspension, Respondent shall not engage in any practice for which a license issued by  
10 the Board is required until the Board has notified Respondent that a medical determination  
11 permits Respondent to resume practice. This period of suspension will not apply to the reduction  
12 of this probationary time period.

13 If Respondent fails to have the above assessment submitted to the Board within the 45-day  
14 requirement, Respondent shall immediately cease practice and shall not resume practice until  
15 notified by the Board. This period of suspension will not apply to the reduction of this  
16 probationary time period. The Board may waive or postpone this suspension only if significant,  
17 documented evidence of mitigation is provided. Such evidence must establish good faith efforts  
18 by Respondent to obtain the assessment, and a specific date for compliance must be provided.  
19 Only one such waiver or extension may be permitted.

20 **14. Participate in Treatment/Rehabilitation Program for Chemical Dependence.**

21 Respondent, at her expense, shall successfully complete during the probationary period or shall  
22 have successfully completed prior to commencement of probation a Board-approved  
23 treatment/rehabilitation program of at least six months duration. As required, reports shall be  
24 submitted by the program on forms provided by the Board. If Respondent has not completed a  
25 Board-approved treatment/rehabilitation program prior to commencement of probation,  
26 Respondent, within 45 days from the effective date of the decision, shall be enrolled in a program.  
27 If a program is not successfully completed within the first nine months of probation, the Board  
28 shall consider Respondent in violation of probation.

Based on Board recommendation, each week Respondent shall be required to attend at least one, but no more than five 12-step recovery meetings or equivalent (e.g., Narcotics Anonymous, Alcoholics Anonymous, etc.) and a nurse support group as approved and directed by the Board. If a nurse support group is not available, an additional 12-step meeting or equivalent shall be added. Respondent shall submit dated and signed documentation confirming such attendance to the Board during the entire period of probation. Respondent shall continue with the recovery plan recommended by the treatment/rehabilitation program or a licensed mental health examiner and/or other ongoing recovery groups.

**15. Abstain from Use of Psychotropic (Mood-Altering) Drugs.** Respondent shall completely abstain from the possession, injection or consumption by any route of all controlled substances and all psychotropic (mood altering) drugs, including alcohol, except when the same are ordered by a health care professional legally authorized to do so as part of documented medical treatment. Respondent shall have sent to the Board, in writing and within fourteen (14) days, by the prescribing health professional, a report identifying the medication, dosage, the date the medication was prescribed, the Respondent's prognosis, the date the medication will no longer be required, and the effect on the recovery plan, if appropriate.

Respondent shall identify for the Board a single physician, nurse practitioner or physician assistant who shall be aware of Respondent's history of substance abuse and will coordinate and monitor any prescriptions for Respondent for dangerous drugs, controlled substances or mood-altering drugs. The coordinating physician, nurse practitioner, or physician assistant shall report to the Board on a quarterly basis Respondent's compliance with this condition. If any substances considered addictive have been prescribed, the report shall identify a program for the time limited use of any such substances.

The Board may require the single coordinating physician, nurse practitioner, or physician assistant to be a specialist in addictive medicine, or to consult with a specialist in addictive medicine.

**16. Submit to Tests and Samples.** Respondent, at her expense, shall participate in a random, biological fluid testing or a drug screening program which the Board approves. The

length of time and frequency will be subject to approval by the Board. Respondent is responsible for keeping the Board informed of Respondent's current telephone number at all times. Respondent shall also ensure that messages may be left at the telephone number when she is not available and ensure that reports are submitted directly by the testing agency to the Board, as directed. Any confirmed positive finding shall be reported immediately to the Board by the program and Respondent shall be considered in violation of probation.

In addition, Respondent, at any time during the period of probation, shall fully cooperate with the Board or any of its representatives, and shall, when requested, submit to such tests and samples as the Board or its representatives may require for the detection of alcohol, narcotics, hypnotics, dangerous drugs, or other controlled substances.

If Respondent has a positive drug screen for any substance not legally authorized and not reported to the coordinating physician, nurse practitioner, or physician assistant, and the Board files a petition to revoke probation or an accusation, the Board may suspend Respondent from practice pending the final decision on the petition to revoke probation or the accusation. This period of suspension will not apply to the reduction of this probationary time period.

If Respondent fails to participate in a random, biological fluid testing or drug screening program within the specified time frame, Respondent shall immediately cease practice and shall not resume practice until notified by the Board. After taking into account documented evidence of mitigation, if the Board files a petition to revoke probation or an accusation, the Board may suspend Respondent from practice pending the final decision on the petition to revoke probation or the accusation. This period of suspension will not apply to the reduction of this probationary time period.

17. **Mental Health Examination.** Respondent shall, within 45 days of the effective date of this Decision, have a mental health examination including psychological testing as appropriate to determine her capability to perform the duties of a registered nurse. The examination will be performed by a psychiatrist, psychologist or other licensed mental health practitioner approved by the Board. The examining mental health practitioner will submit a written report of that assessment and recommendations to the Board. All costs are the responsibility of Respondent.

1 Recommendations for treatment, therapy or counseling made as a result of the mental health  
2 examination will be instituted and followed by Respondent.

3 If Respondent is determined to be unable to practice safely as a registered nurse, the  
4 licensed mental health care practitioner making this determination shall immediately notify the  
5 Board and Respondent by telephone, and the Board shall request that the Attorney General's  
6 office prepare an accusation or petition to revoke probation. Respondent shall immediately cease  
7 practice and may not resume practice until notified by the Board. During this period of  
8 suspension, Respondent shall not engage in any practice for which a license issued by the Board  
9 is required, until the Board has notified Respondent that a mental health determination permits  
10 Respondent to resume practice. This period of suspension will not apply to the reduction of this  
11 probationary time period.

12 If Respondent fails to have the above assessment submitted to the Board within the 45-day  
13 requirement, Respondent shall immediately cease practice and shall not resume practice until  
14 notified by the Board. This period of suspension will not apply to the reduction of this  
15 probationary time period. The Board may waive or postpone this suspension only if significant,  
16 documented evidence of mitigation is provided. Such evidence must establish good faith efforts  
17 by Respondent to obtain the assessment, and a specific date for compliance must be provided.  
18 Only one such waiver or extension may be permitted.

19 **18. Therapy or Counseling Program.** Respondent, at her expense, shall participate in  
20 an on-going counseling program until such time as the Board releases her from this requirement  
21 and only upon the recommendation of the counselor. Written progress reports from the counselor  
22 will be required at various intervals.

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ACCEPTANCE

I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 1/4/2013

Jacqueline Ann Williams  
JACQUELEEN ANN WILLIAMS  
Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated: 1/8/13

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
MARC D. GREENBAUM  
Supervising Deputy Attorney General

Zachary T. Fanelow  
ZACHARY T. FANSELOW  
Deputy Attorney General  
Attorneys for Complainant

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## **Exhibit A**

**Statement of Issues No. 2013-87**

1 KAMALA D. HARRIS  
Attorney General of California  
2 MARC D. GREENBAUM  
Supervising Deputy Attorney General  
3 ZACHARY T. FANSELOW  
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10 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues  
12 Against:

13 **JACQUELEEN ANN WILLIAMS,**  
14 **AKA JACQUELEE A. LIM,**  
15 **AKA JACQUELEEN A. ANDERSON**  
16 **8040 W. Avenue C12**  
17 **Lancaster, CA 93536**

18 Registered Nurse License Applicant

19 Respondent.

Case No. **2013-87**

**STATEMENT OF ISSUES**

20 Complainant alleges:

21 **PARTIES**

22 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Statement of Issues solely in  
23 her official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
24 Consumer Affairs (Board).

25 2. On or about August 11, 2011, the Board of Registered Nursing, Department of  
26 Consumer Affairs received an application for a Registered Nurse License from Jacqueline Ann  
27 Williams aka Jacquelee A. Lim aka Jacqueline A. Anderson (Respondent). On or about August  
28 8, 2011, Respondent certified under penalty of perjury to the truthfulness of all statements,  
answers, and representations in the application. The Board denied the application on December  
20, 2011.





1       7.    Section 2761 states:

2       "The board may take disciplinary action against a certified or licensed nurse or deny an  
3 application for a certificate or license for any of the following:

4       "(a) Unprofessional conduct, which includes, but is not limited to, the following:

5       ....

6       "(d) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the  
7 violating of, or conspiring to violate any provision or term of this chapter or regulations adopted  
8 pursuant to it.

9       ....

10       "(f) Conviction of a felony or of any offense substantially related to the qualifications,  
11 functions, and duties of a registered nurse, in which event the record of the conviction shall be  
12 conclusive evidence thereof. . . ."

13       8.    Section 2762 states, in pertinent part:

14       "In addition to other acts constituting unprofessional conduct within the meaning of this  
15 chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this  
16 chapter to do any of the following:

17       "(a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed  
18 physician and surgeon, dentist or podiatrist administer to himself or herself, or furnish or  
19 administer to another, any controlled substance as defined in Division 10 (commencing with  
20 Setion 11000) of the Health and Safety Code or any dangerous drug or dangerous device as  
21 defined in Section 4022.

22       "(b) Use any controlled substance as defined in Division 10 (commencing with Section  
23 11000) of the Health and Safety Code, or any dangerous drug or dangerous device as defined in  
24 Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or injurious to  
25 himself or herself, any other person, or the public or to the extent that such use impairs his or her  
26 ability to conduct with safety to the public the practice authorized by his or her license.

27       "(c) Be convicted of a criminal offense involving the prescription, consumption, or  
28 self-administration of any of the substances described in subdivisions (a) and (b) of this section,

1 or the possession of, or falsification of a record pertaining to, the substances described in  
2 subdivision (a) of this section, in which event the record of the conviction is conclusive evidence  
3 thereof. . . ."

4 **REGULATORY PROVISION**

5 9. California Code of Regulations, title 16, section 1444 states, in pertinent part:

6 "A conviction or act shall be considered to be substantially related to the qualifications,  
7 functions or duties of a registered nurse if to a substantial degree it evidences the present or  
8 potential unfitness of a registered nurse to practice in a manner consistent with the public health,  
9 safety, or welfare. . . ."

10 **FIRST CAUSE FOR DENIAL OF APPLICATION**

11 **(Convictions of Substantially-Related Crimes)**

12 10. Respondent's application is subject to denial under section 480, subdivision (a)(1),  
13 and section 2761, subdivision (f), and California Code of Regulations, title 16, section 1444, in  
14 that Respondent was convicted of crimes substantially related to the qualifications, functions, and  
15 duties of a registered nurse, as follows:

16 a. On or about November 20, 2003, after pleading guilty, Respondent was convicted of  
17 one count of violating New York Vehicle and Traffic Law section 1192 [operating a motor  
18 vehicle while under the influence of alcohol or drugs] in the criminal proceeding entitled *People*  
19 *of the State of New York v. Jacquelee A. Lim* (N.Y. J. Ct., Sullivan County, 2003, No. 03080136.)  
20 The Court fined Respondent \$300.00.

21 b. The circumstances underlying the conviction are that Respondent was arrested on or  
22 about August 17, 2003, for operating a motor vehicle while under the influence of alcohol.

23 c. On or about April 1, 2002, Respondent was convicted of one count of violating New  
24 Jersey Statutes Annotated section 39:4-50 [driving while intoxicated] in the criminal proceeding  
25 entitled *The People of the State of New Jersey v. Jacquelee A. Lim* (N.J. Muni. Ct., Morris  
26 County, 2002, No. 1431P049317). The Court sentenced Respondent to 48 hours at an Intoxicated  
27 Driver Resource Center, ordered her to complete 30 days of Community Service, revoked her  
28 license for 730 days, and ordered her to not drive without a vehicle interlock device for one (1)

1 year.

2 d. The circumstances underlying the conviction are that on or about January 19, 2002,  
3 Respondent drove a vehicle with a tested blood alcohol content of 0.09/0.12/0.12%. On or about  
4 January 20, 2002, Respondent was admitted for five days of detoxification at Summit Hospital.

5 e. On or about January 30, 1996, after pleading guilty, Respondent was convicted of one  
6 count of violating New Jersey Statutes Annotated section 39:4-50 [driving while intoxicated] in  
7 the criminal proceeding entitled *The People of the State of New Jersey v. Jacqueline Williams*  
8 (N.J. Muni. Ct., Bergen County, 1995, No. R03926). The Court sentenced Respondent to 12-48  
9 hours at an Intoxicated Driver Resource Center, and ordered her driving privileges suspended for  
10 six (6) months.

11 f. The circumstances underlying the conviction are that on or about October 29, 1995,  
12 Respondent drove a vehicle with a tested blood alcohol content of 0.12/0.12%.

13 **SECOND CAUSE FOR DENIAL OF APPLICATION**

14 **(Unprofessional Conduct)**

15 11. Respondent's application is subject to denial under section 2761, subdivision (a), and  
16 section 2762, subdivisions (b) and (c), on the grounds of unprofessional conduct, as follows:

17 a. On or about November 20, 2003, April 1, 2003, and January 30, 1996, Respondent  
18 was convicted of crimes involving alcoholic beverages.

19 b. On or about August 17, 2003, January 19, 2002, and October 29, 1995, Respondent  
20 dangerously used alcohol beverages to an extent or in a manner dangerous or injurious to herself  
21 or others.

22 Complainant refers to and by this reference incorporates the allegations set forth above in  
23 paragraph 10, subparagraphs a through f, inclusive, as though set forth fully.

24 **THIRD CAUSE FOR DENIAL OF APPLICATION**

25 **(Conduct Warranting Discipline of Licensee)**

26 12. Respondent's application is subject to denial under section 480, subdivision (a)(3)(A),  
27 for violating section 490, and section 2761, subdivisions (a) and (f), in that Respondent  
28 committed acts of unprofessional conduct and sustained criminal convictions involving the use of

1 alcoholic beverages. Complainant refers to and by this reference incorporates the allegations set  
2 forth above in paragraphs 10 and 11, inclusive, as though set forth fully.

3 **FOURTH CAUSE FOR DISCIPLINE**

4 **(Unlawfully Obtaining, Possessing and Using Controlled Substances)**

5 13. Respondent's application is subject to denial under section 2761, subdivision (a),  
6 and section 2762, subdivisions (a) and (b), on the grounds of unprofessional conduct, in that in or  
7 about 2002, Respondent obtained, possessed and used controlled substances and dangerous drugs,  
8 without valid prescriptions.

9 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

10 **(Violating Provisions of the Nursing Practice Act)**

11 14. Respondent's application is subject to denial under section 2761, subdivision (d), for  
12 violating numerous provisions of the Nursing Practice Act [§ 2700, et seq.]. Complainant refers  
13 to and incorporates all the allegations contained in paragraphs 10 through 13, inclusive, as though  
14 set forth fully

15 **PRAYER**

16 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
17 and that following the hearing, the Board issue a decision:

- 18 1. Denying Jacqueline Ann Williams aka Jacquelee A. Lim aka Jacqueline A.  
19 Anderson's Registered Nurse License Application; and  
20 2. Taking such other and further action as deemed necessary and proper.

21 DATED: August 2, 2012

22 Louise R. Bailey  
23 LOUISE R. BAILEY, M.ED., RN  
24 Executive Officer  
25 Board of Registered Nursing  
26 Department of Consumer Affairs  
27 State of California  
28 Complainant

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